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CHINA NATIONAL CHARTERING CORPORATION  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
OCEAN LINE HOLDINGS LIMITED,	:
	:
Plaintiff,	:
	:
- against -	:
	:
CHINA NATIONAL CHARTERING CORPORATION,	:
	:
Defendant.	:
-----X	

**NOTICE OF MOTION TO VACATE MARITIME ATTACHMENT  
OR IN THE ALTERNATIVE FOR COUNTERSECURITY**

Defendant, CHINA NATIONAL CHARTERING CORPORATION, through its attorneys, Lennon, Murphy & Lennon, LLC, upon the annexed Declarations of Dihuang Song, Xing Nai Qun and Patrick F. Lennon, as well as the accompanying Memorandum of Law, and all the pleadings heretofore had herein, will move this Court before the Honorable Denny Chin at the United States Courthouse, 500 Pearl Street, Courtroom 11A, New York, New York as soon as the parties can be heard, for an order pursuant to Supplemental Rule E(4)(f) for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("Admiralty Rules") vacating the Ex Parte Attachment Order dated September 20, 2007 on the basis that the attachment of the Defendant's assets in this action is improper or, in the alternative, for an order

**AFFIRMATION OF SERVICE**

I hereby certify that on October 18, 2007, a copy of the foregoing Notice of Motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: 

Patrick F. Lennon

directing Plaintiff to post countersecurity pursuant to Admiralty Rule E(7)(a) in the amount of \$9,640,457.89.

Dated: October 18, 2007  
New York, New York

The Defendant,  
CHINA NATIONAL CHARTERING CORPORATION

By: 

Patrick F. Lennon (PL 2162)  
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